



10900-B Stonelake Boulevard, Suite 126 • Austin, Texas 78759 U.S.A.  
Phone: +1-512-498-9434 (WIFI) • Fax: +1-512-498-9435  
[www.wi-fi.org](http://www.wi-fi.org)

October 16, 2017

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: *Ex Parte Notification***

**GN Docket No. 17-183**, *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*;

**ET Docket No. 13-49**, *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*;

**GN Docket No. 14-177**, *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*.

Dear Ms. Dortch:

On October 12, 2017, Edgar Figueroa, President and CEO of Wi-Fi Alliance, and I conducted separate meetings with the following members of the Commission's staff:

- Rachael Bender, Legal Advisor to Chairman Pai
- Louis Peraertz, Senior Legal Advisor to Commissioner Clyburn
- Kevin Holmes, Acting Legal Advisor to Commissioner Carr
- Office of Engineering and Technology – Julius Knapp, Jamison Prime, Walter Johnston, Bahman Badipour, Brian Butler, Karen Rackley and Aole Wilkins
- International Bureau – James Schlichting, Kathy O'Brien, Jose Albuquerque<sup>1/</sup>

We noted the great success of Wi-Fi – with billions of devices shipped per year – as, among other things, consumers' primary means of accessing the Internet. We described developing standards, including 802.11ax which, like other fifth generation ("5G") wireless technologies, will require access to greater bandwidths. That is why it is critical that the Commission act to make the 5.925-7.125 GHz band available for Wi-Fi and other unlicensed uses. We stated our hope that the Commission will issue a Notice of Proposed Rulemaking ("NPRM") in the so-called "Mid-Band" proceeding in early 2018 to begin the process of making that spectrum available.<sup>2/</sup> We noted that the *Mid Band NOI* is focused on several spectrum bands and urged the Commission to proceed separately with respect to the 5.925-7.125 GHz band which, because of the sharing Wi-Fi Alliance and others propose, presents less complex

---

<sup>1/</sup> Russell Fox of Mintz Levin joined us for the meetings with staff of the Office of Engineering and Technology and the International Bureau.

<sup>2/</sup> *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket 17-183, Notice of Inquiry, 32 FCC Rcd 6373 (2017) ("*Mid-Band NOI*").

technical issues than those related to potentially relocating incumbent users from other bands under consideration.

In our meeting with the staff of the International Bureau in particular, we noted Wi-Fi's history of success in sharing spectrum in the U-NII-1 band with satellite operations and that sharing in the 6 GHz band will present even less opportunity for interference because of the greater distances between Wi-Fi devices and satellites in that band. We also noted that satellite stations currently share the 6 GHz band with high-power fixed service ("FS") links and that there will therefore be no meaningful increase in potential interference to satellite use of the band.

We reminded Ms. Bender that Wi-Fi Alliance and several other membership-based organizations, seek a modest extension of time to submit reply comments in response to the *Mid Band NOI*. We pointed out that while we wish the Commission to act promptly to issue an NPRM, the brief extension we sought will help the Commission to further develop the record in this proceeding. We also noted that the Commission's Electronic Comment Filing System ("ECFS") appeared to have inadvertently removed access to multiple comments in this proceeding, making the preparation of reply comments problematic.

Finally, we urged the Commission to complete the process of evaluating the 5.9 GHz band for use by Wi-Fi and other unlicensed technologies. Use of the 5.9 GHz band will permit greater use of the 5 GHz band in general for Wi-Fi operations, permitting expansion of Wi-Fi use of the band and the creation of additional capacity.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced dockets and a copy is being provided to each member of the Commission's staff with whom we met. Please direct any questions regarding this filing to me.

Respectfully submitted,

/s/ Alex Roytblat

Alex Roytblat  
Senior Director of Regulatory Affairs

cc: (each electronically)  
Rachael Bender  
Louis Peraertz  
Kevin Holmes  
Julius Knapp  
Jamison Prime  
Walter Johnston  
Bahman Badipour  
Brian Butler  
Karen Rackley  
Aole Wilkins  
James Schlichting  
Kathy O'Brien  
Jose Albuquerque